

DOCKET NO: NNH-CV-16-6062169-S : SUPERIOR COURT
PATRICIA HELLIGER : J.D. OF NEW HAVEN
V. : AT NEW HAVEN
CITY OF NEW HAVEN, NEW HAVEN
POLICE CHIEF DEAN ESSERMAN, ET AL : FEBRUARY 19, 2018

PLAINTIFF'S TRIAL MANAGEMENT CONFERENCE REPORT

The plaintiff, Patricia Helliger, hereby submits her Trial Management Conference Report:

1. A non-argumentative description of the case.
2. A list of issues which are in dispute.
3. A list of pending motions.
4. A list of exhibits (to be provided at the time of trial).
5. A list of witnesses.
6. An estimate of days required for evidence.
7. Scheduling issues – None for the plaintiff.

NON-ARGUMENTATIVE CASE DESCRIPTION

The plaintiff, Patricia Helliger, has brought this matter alleging race and gender based discrimination pursuant to the provisions of Conn. Gen. Stat. Sec. 46(a)(1) after the issuance of a Release of Jurisdiction by the Connecticut Commission on Human Rights and Opportunities, where the case commenced.

The plaintiff is the New Haven Police Department's first female African-American Captain. Pursuant to a Second Amended Complaint dated 08/18/2017, she has alleged an ongoing pattern of discrimination and retaliation on the part of the defendant City of New Haven, acting by and through its former Police Chief, Dean Esserman.

DISPUTED ISSUES

1. Liability
2. Damages

PENDING MOTIONS

None for the plaintiff.

PLAINTIFF'S EXHIBIT LIST

1. All documents appended to the plaintiff's 06/09/2017 Memorandum in Opposition to the defendant's Motion for Summary Judgment; and,
2. All documents submitted in response to the defendant's Request for Disclosure and Production dated 05/26/2017.

WITNESS LIST

Plaintiff's Witnesses

1. Thad Reddish, Asst. Chief, (Retired), New Haven Police Department;
2. Odell Cohens, Captain, (Retired), New Haven Police Department;
3. Craig Miller, President, Elm City Local;
4. Denise Blanchard, Captain, New Haven Police Department;
5. Bryan Kearny, Captain, New Haven Police Department;
6. Tom Harkins, Detective, New Haven Police Department;
7. Jeffrey Hoffman, Lieutenant, New Haven Police Department;
8. Luis Casanova, Assistant Chief, New Haven Police Department;
9. Julie Johnson, Lieutenant, New Haven Police Department;
10. James Bottiglieri, New Haven Police Department;
11. May Joyner, New Haven Police Department;
12. Anthony Campbell, Acting Chief, New Haven Police Department;
13. Louis Cavaliere, Jr., Former President, Elm City Local;
14. Joseph Witkowski, Captain, New Haven Police Department;
15. Rebecca Sweeney, Lieutenant, New Haven Police Department;
16. Noelia Marcano, Chief Examiner, City of New Haven;
17. Al Vazquez, Acting Chief, New Haven Police Department;
18. Rose Turney, Sargent (Patrol), New Haven Police Department;
19. Doug Harkins, Lieutenant (Patrol), New Haven Police Department;
20. Jason Minardi, Lieutenant (IA), New Haven Police Department; and,
21. Rose Dell, Sargent, (IA), New Haven Police Department.

LAW OFFICES OF PATRICIA A. COFRANCESCO

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PROPOSED JURY INSTRUCTIONS & VERDICT FORMS

Not Applicable – Courtside Trial.

SCHEDULING ISSUES

None for the plaintiff.

**THE PLAINTIFF,
PATRICIA HELLIGER**

By: 

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CERTIFICATION

I hereby certify that a copy of the foregoing was e-mailed this 19th day of February, 2018 to the following:

Cristin E. Sheehan, Esq.
Alexa M. Farmer, Esq.
Morrison Mahoney LLP
1 Constitution Plaza, 10th Flr.
Hartford, CT 06103-1810



Patricia A. Cofrancesco